

EXHIBIT 1

Subject: Re: Document Production on Behalf of Fanatics
Case 1:23-cv-09714-LTS-VF Document 179-1 Filed 05/30/25 Page 2 of 3
Sent: 5/19/2025, 5:27:13 PM
From: Eric Brenner<EBrenner@BSFLP.com>
To: Ted Ovrom; Stuart Singer; Sabria McElroy; Jessica Mugler; Megan Nyman; Jason Hilborn
Cc: Michael Carlinsky; Derek Shaffer; Kathryn Bonacorsi; Neil Phillips; Amanda.Reeves@lw.com; Lawrence.Buterman@lw.com; Alicia.Jovais@lw.com; David.Johnson@lw.com; Emily.Viola@lw.com; Serena.Candelaria@lw.com

[EXTERNAL EMAIL from ebrenner@bsflp.com]

Counsel,

We have reviewed the license agreements produced on May 13, 2025. It remains our view that no redactions of these core trading card agreements are appropriate or justifiable under the Protective Order. Regardless, the redactions cover "financial terms" that are squarely relevant to the litigation. For example, the redactions cover terms regarding equity that are directly at issue in Panini's claims. Am. Compl. ¶¶ 8, 111, 181. The redactions also cover financial terms like royalty rates and minimum guarantees that are also squarely relevant to the litigation, including to Fanatics's defense that it obtained the license agreements because it offered "licensors better products and terms than Panini provided." Defs.' Answer at 2.

Please let us know when you are available to meet and confer to see if we can at least minimize the issues the Court will need to decide regarding the redactions at the next conference. We are available Wednesday (5/20) from 4pm-6pm, Thursday (5/21) from 1pm-2pm or Friday (5/22) from 3pm-5:30pm.

Finally, to the extent your letter is intended to suggest that your production is subject to conditions that go beyond the restrictions in the Protective Order, we do not agree. We of course confirm that BSF is not going to breach a court order governing the use of the License Agreements as Mr. Boies said in the letter you cite.

Thanks.

--Eric

From: Ted Ovrom <tedovrom@quinnmanuel.com>
Date: Tuesday, May 13, 2025 at 9:02 PM
To: Eric Brenner <EBrenner@BSFLP.com>, Stuart Singer <ssinger@bsflp.com>, Sabria McElroy <smcelroy@bsflp.com>, Jessica Mugler <jmugler@BSFLP.com>, Megan Nyman <mnyman@bsflp.com>, Jason Hilborn <jhilborn@bsflp.com>
Cc: Michael Carlinsky <michaelcarlinsky@quinnmanuel.com>, Derek Shaffer <derekshaffer@quinnmanuel.com>, Kathryn Bonacorsi <kathrynbonacorsi@quinnmanuel.com>, Neil Phillips <neilphillips@quinnmanuel.com>, Amanda.Reeves@lw.com <Amanda.Reeves@lw.com>, Lawrence.Buterman@lw.com <Lawrence.Buterman@lw.com>, Alicia.Jovais@lw.com <Alicia.Jovais@lw.com>, David.Johnson@lw.com <David.Johnson@lw.com>, Emily.Viola@lw.com <Emily.Viola@lw.com>, Serena.Candelaria@lw.com <Serena.Candelaria@lw.com>
Subject: Document Production on Behalf of Fanatics

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Counsel,

Please see the attached production letter. The password will be sent under separate cover.

Best,

Ted Ovrom

Associate

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